

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

ECOLAB Inc., and NALCO COMPANY,
LLC d/b/a Nalco Water, an Ecolab Company
and/or Nalco Water,

Plaintiffs,

v.

ANTHONY RIDLEY and CHEMTREAT,
INC.,

Defendants.

Case No. 1:22-cv-00050

District Judge Travis R. McDonough

Magistrate Judge Christopher H. Steger

PLAINTIFFS' PROPOSED JURY VERDICT FORM¹

1. Did **Anthony Ridley** misappropriate one or more of Plaintiffs' trade secret(s)?

_____ No

_____ Yes

If yes, how much money do you award Plaintiffs in connection with **Anthony Ridley's** misappropriation of trade secrets?

Amount \$ _____

¹ Plaintiffs assert that this streamlined verdict form is the proper vehicle for the jury to express its verdict. The jury instructions that will precede these forms are substantial and will fully equip the jury to reach its verdict under the law *without* the necessity of filling out Defendants' seventeen-page gauntlet of granular and often redundant interrogatories. Contrary to Defendants' stated purpose, their proposed verdict form is not a response to the complexity of the case; rather it is designed to *introduce* complexity to the jury's deliberations for no other purpose than to confuse and disincentivize them from rendering a verdict for Plaintiffs. Plaintiffs submit that the verdict forms herein are proper and sufficient for this case.

2. Did **ChemTreat, Inc.** misappropriate one or more of Plaintiffs' trade secret(s)?

_____ No

_____ Yes

If yes, how much money do you award Plaintiffs in connection with **ChemTreat, Inc.'s** misappropriation of trade secrets?

Amount \$ _____

3. Did **Anthony Ridley** breach a fiduciary duty he owed to Plaintiffs?

_____ No

_____ Yes

If yes, how much do you award Plaintiffs in connection with any Anthony Ridley's breach of fiduciary duties?

Amount: \$ _____

4. Did **Anthony Ridley** breach a contract with Plaintiffs?

_____ No

_____ Yes

If yes, how much money do you award Plaintiffs in connection with Anthony Ridley's breach of contract ?

Amount: \$ _____

5. Did **ChemTreat, Inc.** induce Anthony Ridley to breach his contract with Plaintiffs ?

_____ No

_____ Yes.

If yes, how much money do you award Plaintiffs in connection with ChemTreat, Inc. intentionally inducing Anthony Ridley to breach his contract with Plaintiffs?

Amount: \$ _____

6. Did **ChemTreat, Inc.** procure the breach of Anthony Ridley's contract with Plaintiffs?

_____ No

_____ Yes.

If yes, how much money do you award Plaintiffs in connection with ChemTreat, Inc. procuring the breach of Anthony Ridley's contract with Plaintiffs?

Amount: \$ _____

7. Did Anthony Ridley and ChemTreat, Inc. engage in a civil conspiracy against Plaintiffs?

_____ No

_____ Yes

If yes, how much money do you award Plaintiffs in connection with the civil conspiracy?

Amount: \$ _____

FINAL INSTRUCTION: Please have the foreperson sign and date this form and return it to the court officer.

FOREPERSON

DATE